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RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN LEE DAVIS,  
aka "Slow,"  
aka "Yellow Dude,"  
DARON OWENS  
aka "Little Brother";  
CHRISTOPHER L. MASTERS,  
aka "Crid";  
TASHIRI TALIB-DIN,  
aka "Killer Reg,"  
aka "K.R.,"  
aka "Tasha";  
JAMES PATTON;  
KENNETH NEVILLE,  
aka "Kenny Smith,"  
aka "Randall V. Terry";  
LIONEL McCOY,  
aka "Jock";  
CHRISTINE JACKSON;  
MARCUS BELTON,  
aka "Samuel Glenn,"  
aka "Rambo";  
EMMANUEL CHRISTY;  
WILLIE MORRIS CLAY;  
CHARLES EDWARDS,  
aka "Charles Summers";  
ANGELOU MASTERS; and  
MARVIN WOODARD,

Defendants.

NO. CR-98-40082-DLJ

VIOLATIONS:

21 U.S.C. § 848 - Continuing  
Criminal Enterprise; 21 U.S.C.  
§ 846 - Conspiracy to Possess  
With Intent to Distribute and to  
Distribute Cocaine; 21 U.S.C.  
§ 846 - Attempt to Possess With  
Intent to Distribute Cocaine;  
21 U.S.C. § 841(a)(1) -  
Possession with Intent to  
Distribute / Distribution of  
Cocaine; 21 U.S.C. § 843(b) -  
Use of a Telephone Facility to  
Further a Drug Felony;  
18 U.S.C. § 924(c) - Use/Carry/  
Possess a Firearm in the  
Course of a Drug Felony;  
18 U.S.C. § 922(g) - Illegal  
Possession of a Firearm /  
Ammunition by a Convicted  
Felon; 19 U.S.C. § 1952 -  
Use of Interstate Facility in Aid  
of Racketeering Activity; 18  
U.S.C. § 1956(a)(1)(A)(i)  
and 1957 - Money  
Laundering; 18 U.S.C. § 2 -  
Aiding and Abetting; 18 U.S.C.  
§ 3 - Accessory After the Fact;  
18 U.S.C. § 922(k) - Possession  
of a Firearm with an  
Obliterated Serial Number

SECOND SUPERSEDING INDICTMENT

**COUNT ONE:** (21 U.S.C. § 848)

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but not later than during in or about the year 1995, and continuing up to and including in or about June 3, 1998, in the State and Northern District of California and elsewhere KEVIN LEE DAVIS, defendant herein, knowingly, willfully, unlawfully and intentionally did engage in a continuing criminal enterprise that involved a substance containing a detectable amount of cocaine, a Schedule I controlled substance, in that he did:

- 1) Possess with intent to distribute and distribute cocaine, and aid and abet the possession with intent to distribute and distribution of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as alleged in Counts Seven through Thirty-Three of this Second Superseding Indictment, which are incorporated herein by reference;
- 2) Conspire to possess with intent to distribute and to distribute cocaine in violation of Title 21, United States Code, Section 846, as alleged in Counts Two and Three of this Second Superseding Indictment which are incorporated herein by reference;
- 3) Attempt to possess with intent to distribute and to distribute cocaine in violation of Title 21, United States Code, Section 846, as alleged in Counts Four and Six of this Second Superseding Indictment which are incorporated herein by reference; and
- 4) Use and aid and abet the use of a communication facility to facilitate the commission of felony violations of Title 21, United States Code, in violation of Title 21, United States Code, Section 843(b) as alleged in Counts Thirty-Four through Seventy-Five of this Second Superseding Indictment, which are incorporated herein by reference;

which violations, among others, were part of a continuing series of violations undertaken by defendant KEVIN LEE DAVIS in concert with at least five other persons with respect to whom defendant KEVIN LEE DAVIS occupied a position of organizer, supervisor and manager, and from which continuing series of violations defendant KEVIN LEE DAVIS obtained substantial income and resources;

1 The Grand Jury further charges that as to the offense charged herein in Count One  
2 of the Second Superseding Indictment the defendant KEVIN LEE DAVIS occupied the  
3 position of principal administrator, organizer and leader of the enterprise and further finds  
4 that the violation involved at least 300 times the quantity of a substance described in Title  
5 21 United States Code, Section 841(b)(1)(B), that is: 150 kilograms or more of a  
6 substance containing cocaine.

7 All in violation of Title 21, United States Code, Section 848.  
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COUNT TWO: (21 U.S.C. § 846)

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but not later than in and during the year 1995 and continuing thereafter until at least on or about June 3, 1998, in the County of Alameda, Northern District of California, and elsewhere,

KEVIN LEE DAVIS,  
aka "Slow,"  
aka "Yellow Dude";  
DARON OWENS,  
aka "Little Brother";  
CHRISTOPHER L. MASTERS,  
aka "Crid";  
TASHIRI TALIB-DIN,  
aka "Killer Reg,"  
aka "K.R.,"  
aka "Tasha";  
CHRISTINE JACKSON;  
MARCUS BELTON,  
aka "Samuel Glenn,"  
aka "Rambo";  
EMMANUEL CHRISTY;  
WILLIE MORRIS CLAY;  
CHARLES EDWARDS,  
aka "Charles Summers";  
ANGELOU MASTERS, and  
MARVIN WOODARD,

defendants herein, willfully and knowingly did combine, conspire, confederate and agree with each other and with other persons whose names are both known and unknown to the Grand Jury, including unindicted coconspirators Alfredo Robles-Rosas, Sandy Medina, Herman Malone, and Darvelle Smith, to possess with intent to distribute and to distribute 5 kilograms of more of a substance containing cocaine, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1);

MEANS AND METHODS

1. It was part of the conspiracy that certain of the defendants and their coconspirators whose identities are both known and unknown to the Grand Jury, would and did deliver multiple-kilogram shipments of cocaine to defendant KEVIN LEE DAVIS and his agents.

2. It was further part of the conspiracy that defendant KEVIN LEE DAVIS would and did employ trusted associates to distribute a portion of the cocaine he received to lower level cocaine distributors in the Counties of San Francisco, Alameda, and Contra Costa.
3. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did use a numeric pager code system using telephones, cellular telephones, pagers and public pay telephones to negotiate illicit cocaine transactions, including to communicate the price per kilogram of cocaine, the available or desired quantity, delivery times, locations, and the identity of the customer and delivery courier.
4. It was further part of the conspiracy that certain of the defendants and their coconspirators were identified by unique assigned numbers in the pager code system, including the following: defendant KEVIN LEE DAVIS was code number "84"; defendant DARON OWENS "84" and "8884"; defendant CHRISTOPHER L. MASTERS "112"; defendant TASHIRI TALIB-DIN "11"; defendant LIONEL McCOY "115" and "11500"; defendant CHRISTINE JACKSON "21"; defendant MARCUS BELTON "881"; defendant EMMANUEL CHRISTY "91" and "991"; defendant WILLIE MORRIS CLAY "8687"; defendant CHARLES EDWARDS "966"; defendant ANGELOU MASTERS "88"; defendant MARVIN WOODARD "96"; and unindicted coconspirators Sandy Medina and Alfredo Robles-Rosas "49" and "84."
5. It was further part of the conspiracy that certain of the defendants and their coconspirators when not using the numeric pager code communicated in coded conversations over cellular, residential, and public pay phones, including at times referring to male coconspirators by female names and pronouns to hide their true identity from law enforcement.
6. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did deliver, collect, count, package, store, and transport cash proceeds of cocaine sales for the benefit of defendant KEVIN LEE DAVIS.
7. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did weigh, package, store, transport, and distribute cocaine and cocaine base, and did possess for that purpose weighing and packaging materials such as scales, plastic baggies, and sealing tape.
8. It was further part of the conspiracy that certain of the defendants and their coconspirators planned to, would and did use force, fear, threats, intimidation, murder, reports of murders and attempted murders, and "hush" money to maintain discipline and secrecy within the organization and to avoid detection by law enforcement.
9. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did use aliases and nicknames to disguise their identities so as to avoid detection by law enforcement personnel.

10. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did obtain and possess firearms.
11. It was further part of the conspiracy that certain of the defendants and their coconspirators conducted counter-surveillance while driving and while in public for the purpose of detecting and neutralizing law enforcement efforts to observe their criminal activities.
12. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did rent, purchase, and borrow "stash" apartments and cars to store and transport cocaine, cocaine base, cash proceeds, and firearms as a means to avoid law enforcement detection and seizure of their contraband.
13. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did cause the lessees of physical locations, the registered owners of vehicles, and the subscribers to telephone and public utility services which facilitated the conspiracy to be identified by names other than their own so as to avoid detection by law enforcement personnel.
14. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did conduct their financial transactions in cash to avoid detection by law enforcement personnel.
15. It was further part of the conspiracy that certain of the defendants and their coconspirators created legitimate business "fronts," including Slow Motion Records, for the purposes of laundering illicit cash proceeds of drug sales, and of disguising their illicit drug trafficking income so as to avoid law enforcement detection.
16. It was further part of the conspiracy that certain of the defendants and their coconspirators used the cash proceeds of illicit drug sales to finance their purchase of vehicles, real estate, jewelry, vacations, and other luxury items.

#### OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of it, the defendants and their coconspirators committed the following overt acts, among others, in the State and Northern District of California:

1. On or about July 8, 1995 at approximately 1:15 in the morning, defendant KEVIN LEE DAVIS received a duffle bag containing cocaine from unindicted coconspirator Herman Malone in Oakland, California.
2. On or about July 8, 1995 defendant KEVIN LEE DAVIS was in possession of \$8,500 cash on the 8200 block of Church Street in Oakland, California.
3. On or about July 9, 1995 unindicted coconspirator Herman Malone in Oakland, California possessed approximately one pound of a substance containing cocaine, three fully-loaded firearms, approximately \$22,000 cash, and a triple-beam scale commonly used to weigh out narcotic drugs for sale.

4. On or about July 9, 1995 defendant KEVIN LEE DAVIS paged unindicted coconspirator Herman Malone who was in Oakland, California to call him at (510) 414-3492, a cellular telephone subscribed to by defendant KEVIN LEE DAVIS.
5. On or about September 12, 1995 defendant KEVIN LEE DAVIS drove to 140 Canyon Wood Loop, San Ramon, California, the residence of unindicted coconspirator Darvelle Smith.
6. On or about September 12, 1995, defendant KEVIN LEE DAVIS received \$30,105 cash from defendant CHRISTINE JACKSON in Oakland, California.
7. On or about September 12, 1995 defendant KEVIN LEE DAVIS was in possession of cellular telephone (510) 414-3492, and pager (510) 321-1529 in Oakland, California.
8. Between on or about September 12, 1995 and on or about September 27, 1995 defendant CHRISTINE JACKSON devised a plan to obtain the return to defendant KEVIN LEE DAVIS of the \$30,105 cash defendant CHRISTINE JACKSON had delivered to defendant KEVIN LEE DAVIS on September 12, 1995.
9. On or about September 27, 1995 defendant CHRISTINE JACKSON caused unindicted coconspirators to file false declarations under penalty of perjury with the Alameda County Superior Court to obtain the return of \$30,105 for defendant KEVIN LEE DAVIS.
10. On or about October 10, 1995 defendant CHRISTINE JACKSON possessed heroin, \$16,000 cash, two cellular telephones, three semi-automatic pistols, two money counting machines, and lactose in Oakland, California
11. On or about November 13, 1995 unindicted coconspirator Darvelle Smith was arrested by Oakland Police Officer Tony Jones because he was in possession of approximately 249 grams of crack cocaine, approximately \$2,500 cash, a cellular telephone, a pager, and false identification.
12. On or about between December 25, 1995 and February 20, 1996 certain of the coconspirators acting on behalf of defendant KEVIN LEE DAVIS offered Eric Webster \$25,000 in exchange for his agreement to testify that he no longer knew who shot him.
13. On or about January 18, 1996 defendant KEVIN LEE DAVIS evaded arrest in Alameda County, California by fleeing in a car.
14. On or about January 18, 1996 defendant CHRISTINE JACKSON aided and abetted defendant KEVIN LEE DAVIS' evasion of arrest in San Leandro, California.
15. On or about January 23, 1996 defendant KEVIN LEE DAVIS told Oakland Police Officer Tony Jones that he was not involved in threats directed at Officer Jones by unindicted coconspirator Darvelle Smith.

16. On or about February 2, 1996 defendant KEVIN LEE DAVIS reported to Oakland Police that: his residence address was 2230 - 84<sup>th</sup> Avenue, #B, Oakland, California; he owned Slow Motion Records at 10507 Byron Street in Oakland; and his pager number was (510) 321-1529.
17. On or about February 6, 1996 defendant CHRISTINE JACKSON flew from Oakland, California to Phoenix, Arizona and back to Oakland.
18. On or about between February 8 and 11, 1996 unindicted coconspirators Alfredo Rosas-Robles, Travis Mayo, Julius Bryant and Darvelle Smith, visited defendant KEVIN LEE DAVIS at the Alameda County North County Jail.
19. On or about February 20, 1996 defendant CHRISTINE JACKSON, intending to ensure that Eric Webster recant his truthful report that defendant KEVIN LEE DAVIS attempted to murder him, attended the preliminary hearing of defendant KEVIN LEE DAVIS on charges he attempted to murder Eric Webster.
20. On or about May 20, 1996 unindicted coconspirator Darvelle Smith was in possession of approximately four kilograms of cocaine in St. Louis, Missouri.
21. On or about May 21, 1996 unindicted coconspirator Darvelle Smith was in possession of approximately \$53,000 cash, two semi-automatic pistols, a revolver, a rifle and an assault rifle at his residence in San Ramon, California.
22. On or about August 6, 1996 defendants MARCUS BELTON and CHARLES EDWARDS distributed and aided and abetted the distribution of cocaine in Oakland, California.
23. On or about December 22, 1996 defendant DARON OWENS possessed a loaded 9 mm semi-automatic pistol in San Ramon, California.
24. In or about from the Summer of 1997 to the Summer or 1998 defendants KEVIN LEE DAVIS and DARON OWENS used Apartment 3401 and the associated parking garage at 6400 Christie in Emeryville, California to receive, store, package, and distribute kilograms of cocaine.
25. On or about September 29, 1997 and November 13, 1997 unindicted coconspirator Alfredo Robles-Rosas sent coded pager messages to defendant KEVIN LEE DAVIS' pager (510) 321-1529 to negotiate sales of cocaine to defendant KEVIN LEE DAVIS.
26. On or about February 7, 1998 defendants KEVIN LEE DAVIS and DARON OWENS attempted to deliver one kilogram of cocaine to defendant MARCUS BELTON at the Round Table Pizza on Keller Avenue in Oakland, California.



27. On or about February 7, 1998 defendant MARCUS BELTON warned defendant KEVIN LEE DAVIS that he had seen law enforcement officers at the location where defendant MARCUS BELTON was to receive a kilogram of cocaine.
28. On or about February 10, 1998 defendants CHARLES EDWARDS and KEVIN LEE DAVIS used pagers and telephone conversation to negotiate a sale of three kilograms of cocaine to defendant CHARLES EDWARDS.
29. On or about February 26, 1998 defendant EMMANUEL CHRISTY possessed a kilogram of cocaine.
30. On or about February 26, 1998 defendant EMMANUEL CHRISTY possessed \$1,100 cash, a pager, and a cellular telephone.
31. On or about March 7, 1998 a white Buick Regal (California license No. 2RHX827) registered to Marquis Auto Sales was parked by an unidentified coconspirator at defendant CHRISTOPHER L. MASTERS' residence in Berkeley, California.
32. On or about March 11, 1998 defendants CHARLES EDWARDS and KEVIN LEE DAVIS used pagers and telephone conversation to negotiate a sale of cocaine to defendant CHARLES EDWARDS.
33. On or about March 11, 1998 defendant MARCUS BELTON possessed a controlled substance for sale at a stash apartment he maintained at 1595 - 76<sup>th</sup> Avenue, Oakland, California.
34. On or about March 17, 1998 defendant KEVIN LEE DAVIS used pagers, cellular telephones, public pay telephones, and an established numeric code to negotiate and arrange for the delivery of 49 kilograms of cocaine from unindicted coconspirator Alfredo Robles-Rosas to be delivered by unindicted coconspirator Sandy Medina to defendant KEVIN LEE DAVIS at his stash apartment at 6400 Christie in Emeryville, California.
35. On or about March 17, 1998 unindicted coconspirator Sandy Medina acting on behalf of unindicted coconspirator Alfredo Robles-Rosas transported approximately 47 kilograms of cocaine and a key card that provided access to the parking garage associated with the stash apartment at 6400 Christie to Emeryville, California for the purpose of delivering the cocaine to defendant KEVIN LEE DAVIS.
36. On or about March 17, 1998 defendant KEVIN LEE DAVIS used pagers, cellular telephones, public pay telephones, and his established numeric code system to inform defendants CHRISTOPHER L. MASTERS, TASHIRI TALIB-DIN, DARON OWENS, and others that the large delivery of cocaine he expected to receive that day had been seized by police.
37. On or about March 17, 1998 defendants KEVIN LEE DAVIS and CHRISTINE JACKSON met at the Benihana Restaurant in Concord, California to discuss the seizure by police of the 47 kilograms of cocaine that was to have been delivered to defendant KEVIN LEE DAVIS that day.

- 1 38. On or about March 18, 1998 defendant CHRISTINE JACKSON hired an  
2 attorney to travel from Los Angeles to Emeryville, California to  
3 misrepresent to Emeryville police officials that the family of unindicted  
4 coconspirator Sandy Medina had hired the attorney to represent unindicted  
5 coconspirator Sandy Medina, all for the purpose of obtaining information  
6 about the circumstances of the March 17, 1998 detention of unindicted  
7 coconspirator Sandy Medina, including whether unindicted coconspirator  
8 Sandy Medina had provided information to the police implicating defendant  
9 KEVIN LEE DAVIS in that narcotics trafficking crime.
- 10 39. On or about March 18, 1998 defendant MARCUS BELTON possessed in  
11 Oakland, California packaging materials commonly used in the distribution  
12 of controlled substances.
- 13 40. On or about March 18, 19, and 20, 1998 defendants KEVIN LEE DAVIS  
14 and CHRISTINE JACKSON attempted to identify, locate, and speak with  
15 coconspirator Sandy Medina.
- 16 41. On or about March 22, 1998 defendant DARON OWENS acting on behalf  
17 of defendant KEVIN LEE DAVIS negotiated a sale of cocaine to defendant  
18 MARVIN WOODARD by paging defendant MARVIN WOODARD with  
19 the message "84-14500-84."
- 20 42. On or about March 27, 1998 unindicted coconspirator Sandy Medina on  
21 behalf of and at the direction of defendant KEVIN LEE DAVIS paged  
22 Emeryville Police Captain Frank Sierras to call her at a pay phone in  
23 Pinole, California.
- 24 43. On or about March 27, 1998 unindicted coconspirator Sandy Medina told  
25 Emeryville Police Captain Frank Sierras that the owners of the 47 kilograms  
26 of cocaine seized on March 17, 1998 wanted to buy the cocaine back from  
him and would pay \$300,000 for it.
44. On or about March 27, 1998 defendant KEVIN LEE DAVIS met unindicted  
coconspirator Sandy Medina at Salerno's restaurant in Berkeley, California.
45. On or about March 30, 1998 unindicted coconspirators Alfredo Robles-  
Rosas and Sandy Medina paged Emeryville Police Captain Frank Sierras to  
call a pay telephone in Alameda County, California to further negotiate the  
return of the 47 kilograms of cocaine seized on March 17, 1998.
46. On or about March 31, 1998 unindicted coconspirator Sandy Medina paged  
Emeryville Police Captain Frank Sierras to a pay phone in Pinole,  
California and in the telephone conversation between them that followed  
she further negotiated the return of the 47 kilograms of cocaine.
47. On or about April 1, 1998 unindicted coconspirator Sandy Medina paged  
Emeryville Police Captain Frank Sierras to a pay phone and in the  
telephone conversation between them that followed she advised him that  
her coconspirators were ready to meet Captain Sierras and deliver good  
faith money to him that day.

- 1 48. On or about April 2, 1998 unindicted coconspirators Sandy Medina and  
2 Alfredo Robles-Rosas paged Emeryville Police Captain Frank Sierras to a  
3 pay phone in San Pablo, California and in the telephone conversation  
4 between them that followed unindicted coconspirator Sandy Medina  
5 arranged to meet Captain Sierras that day to deliver good faith money.
- 6 49. On or about April 2, 1998 unindicted coconspirator Sandy Medina  
7 delivered a black suitcase containing \$24,800 cash to Emeryville Police  
8 Captain Frank Sierras in an attempt to buy back the 47 kilograms of cocaine  
9 seized on March 17, 1998.
- 10 50. On or about April 5, 1998 unindicted coconspirator Alfredo Robles-Rosas  
11 negotiated a sale and arranged the delivery of 25 kilograms of cocaine to  
12 defendant KEVIN LEE DAVIS to take place at 106<sup>th</sup> Avenue at 7:00 p.m.  
13 by paging defendant KEVIN LEE DAVIS with the messages "4-50-13700,"  
14 "49-106-25," and "4-106-25-700-411."
- 15 51. On or about April 5, 1998 defendant KEVIN LEE DAVIS confirmed that  
16 he would take delivery of 25 kilograms of cocaine from unindicted  
17 coconspirators Alfredo Robles-Rosas or Sandy Medina at 7 p.m. on 106<sup>th</sup>  
18 Avenue in Oakland by paging unindicted coconspirator Alfredo Robles-  
19 Rosas with the message, "106-25-700-49."
- 20 52. On or about April 5, 1998 defendant DARON OWENS negotiated a sale  
21 and delivery of cocaine to defendant MARVIN WOODARD to take place  
22 at 9:45 p.m. that day by paging defendant MARVIN WOODARD with the  
23 messages, "84-14700-84" and "945-84-14700."
- 24 53. On or about April 5, 1998 defendants DARON OWENS and MARVIN  
25 WOODARD spoke several times on the telephone to negotiate and arrange  
26 for delivery of cocaine by defendant DARON OWENS to defendant  
MARVIN WOODARD.
54. On or about April 7, 1998 at 2:44 p.m. defendant DARON OWENS spoke  
with defendant MARVIN WOODARD on the telephone in Oakland to  
further a narcotics trafficking offense.
55. On or about April 8, 1998 unindicted coconspirators Sandy Medina and  
Alfredo Robles-Rosas paged Emeryville Police Captain Frank Sierras and  
in the telephone conversations that followed further negotiated the return of  
the 47 kilograms of cocaine.
56. On or about April 9, 1998 defendant CHRISTOPHER L. MASTERS told  
defendant KEVIN LEE DAVIS in a telephone conversation that defendant  
KEVIN LEE DAVIS could use defendant CHRISTOPHER L. MASTERS  
to kill, injure, threaten and intimidate persons who caused problems for  
defendant KEVIN LEE DAVIS.
57. On or about April 13, 1998 defendant KEVIN LEE DAVIS and unindicted  
coconspirator Alfredo Robles-Rosas communicated with each other by  
pager messages and telephone conversation to negotiate the delivery of 22  
kilograms of cocaine to defendant KEVIN LEE DAVIS by unindicted  
coconspirator Alfredo Robles-Rosas or Sandy Medina at about 5:30 p.m.  
that same day.

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58. On or about April 13, 1998 defendant KEVIN LEE DAVIS instructed defendant DARON OWENS through pager messages and telephone conversations to take delivery of 22 kilograms of cocaine from unindicted coconspirators Alfredo Robles-Rosas or Sandy Medina at 5:30 p.m. that day and to sell it for between \$14,500 and \$14,700 a kilogram depending on which customers bought it.
  59. On or about April 13, 1998 defendant DARON OWENS negotiated a sale and arranged to deliver cocaine to defendant MARVIN WOODARD at approximately 10:30 p.m. that night through pager messages and telephone conversation.
  60. On or about April 13, 1998 defendant DARON OWENS delivered four kilograms of cocaine to unindicted coconspirator Jean Eason at defendant DARON OWENS' residence at 3425 Wilson Street in Oakland, California.
  61. On or about April 13, 1998 defendant DARON OWENS sent the threatening pager message "187" to Oakland Police Officer Tony Jones.
  62. On or about April 15, 1998 unindicted coconspirators Alfredo Robles-Rosas and Sandy Medina, acting in part on behalf of defendant KEVIN LEE DAVIS, drove to the Emeryville Marina to meet with Emeryville Police Captain Frank Sierras to negotiate the return of the 47 kilograms of cocaine.
  63. On or about April 15, 1998 defendant DARON OWENS was at 6400 Christie Avenue in Emeryville.
  64. On or about April 16, 1998 defendant DARON OWENS negotiated the sale and delivery of cocaine to defendant MARVIN WOODARD to take place at 1:15 p.m. that day through pager messages and telephone conversation.
  65. On or about April 16, 1998 defendants CHARLES EDWARDS and KEVIN LEE DAVIS used pagers to negotiate a 5:30 p.m. delivery of cocaine to defendant CHARLES EDWARDS.
  66. On or about April 17, 1998 defendant DARON OWENS negotiated a sale of two kilograms of cocaine to defendant MARVIN WOODARD.
  67. On or about April 21, 1998 unindicted coconspirators Alfredo Robles-Rosas and Sandy Medina acting in part on behalf of defendant KEVIN LEE DAVIS delivered \$199,860 cash to Emeryville Police Captain Frank Sierras at the Holiday Inn in Emeryville, California.
  68. On or about April 30, 1998 defendant DARON OWENS negotiated a delivery of three kilograms of cocaine at 7 p.m. to defendant MARVIN WOODARD.
  69. On or about May 4, 1998 defendant DARON OWENS sent a message to defendant KEVIN LEE DAVIS' pager advising that he had \$80,000 in cash proceeds from drug sales.

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70. On or about May 4, 1998 defendants DARON OWENS and CHRISTOPHER L. MASTERS agreed in a telephone conversation to meet.
  71. On or about May 5, 1998 defendants MARVIN WOODARD and DARON OWENS negotiated a sale and delivery of one kilogram of cocaine to defendant MARVIN WOODARD to take place at 7 p.m.
  72. On or about May 9, 1998 defendant CHRISTOPHER L. MASTERS told defendant KEVIN LEE DAVIS in a telephone conversation that he would take care of the people who were causing trouble at a house on 84<sup>th</sup> Avenue in Oakland.
  73. On or about May 9, 1998 defendant CHRISTOPHER L. MASTERS told defendant KEVIN LEE DAVIS in a telephone conversation that the people causing trouble on 84<sup>th</sup> Avenue had moved down the block.
  74. On or about May 14, 1998 defendant MARVIN WOODARD ordered a kilogram of cocaine from defendant DARON OWENS by sending defendant DARON OWENS the pager message "2610336-1-8400."
  75. On or about May 15, 1998 defendant KEVIN LEE DAVIS warned defendant CHRISTOPHER L. MASTERS in a telephone conversation not to create a pattern that could be staked out.
  76. On or about May 24, 1998 defendants KEVIN LEE DAVIS and MARCUS BELTON using pager messages negotiated the distribution of at least one kilogram of cocaine to defendant MARCUS BELTON.
  77. On or about May 27, 1998 defendant CHARLES EDWARDS paged defendant KEVIN LEE DAVIS with the message that defendant CHARLES EDWARDS had \$42,000 to spend on cocaine.
  78. On or about June 3, 1998 defendant MARCUS BELTON possessed approximately one kilogram of cocaine.
  79. On or about June 3, 1998 defendant TASHIRI TALIB-DIN possessed approximately 159 grams of crack cocaine, two loaded semi-automatic pistols, a scale used to weigh cocaine, a cellular telephone, court documents related to a 1994 federal wiretap narcotics investigation, and a Cadillac he had obtained as security for a drug debt owed to defendant KEVIN LEE DAVIS.
  80. On or about June 3, 1998 defendant EMMANUEL CHRISTY possessed a pager and a cellular telephone (510) 435-6265 at his residence at 1343 Merced, Richmond, California.
  81. On or about June 3, 1998 defendant LIONEL McCOY possessed a digital scale and a triple-beam scale of the kind used to weigh drugs at his residence at 22525 3<sup>rd</sup> Street in Hayward, California.

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2 82. On or about June 3, 1998 defendant KEVIN LEE DAVIS possessed approximately \$19,427 cash, a cellular telephone, and a pager at his residence.
- 3 83. On or about June 3, 1998 defendants KEVIN LEE DAVIS and DARON OWENS maintained a stash apartment at 6400 Christie Avenue, #3410, Emeryville, California and possessed there a scale to measure out drugs, a white powder used to dilute cocaine, a money counter, rubber bands and plastic wrap, rubber gloves, plastic bags, and twelve 380 caliber rounds of ammunition for a semi-automatic pistol.
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6 84. On or about June 3, 1998 defendant ANGELOU MASTERS possessed three firearms, one of which was stolen, ammunition, a triple-beam scale of the type used to weigh drugs, and a box of baggies to package cocaine for distribution at his residence at 2433 88<sup>th</sup> Avenue, Oakland, California.
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9 85. On or about June 3, 1998 defendant CHRISTOPHER L. MASTERS possessed at his residence at 1630 62<sup>nd</sup>, Apt 1, Berkeley, California pager (510) 452-6693 and four cellular telephones including (510) 882-4217 and (510) 435-4078.
- 10  
11 86. On or about June 3, 1998 defendant DARON OWENS possessed in his Oldsmobile (California license No. 2GZK893) approximately three kilograms of cocaine and \$39,000 cash, and in his residence at 3425 Wilson Avenue, #4, Oakland, California a pager, an Intratec .45 caliber semi-automatic handgun with an obliterated serial number, \$24,000 cash, and a blue duffel bag.
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14 87. On or about June 3, 1998 defendant CHARLES EDWARDS possessed in his residence ammunition for firearms
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16 88. On or about June 3, 1998 defendant MARVIN WOODARD possessed at his residence at 1925 10<sup>th</sup> Avenue, Oakland, California approximately 380 grams of powder cocaine, approximately 379 grams of crack cocaine, a scale of the kind used to measure out drugs, a Lorcin 9 mm semi-automatic handgun with an obliterated serial number, an ammunition clip, a pager, and approximately \$6,200 cash.
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20 The Grand Jury further charges that the offenses set forth in Counts Four through  
21 Six, Twenty-Three, Twenty-Six, Twenty-Nine through Thirty-Three, Forty-One, Forty-  
22 Three through Fifty-One, Sixty, Sixty-Eight, Seventy-Four, Seventy-Five, and One  
23 Hundred One through One Hundred Nine of this Second Superseding Indictment were  
24 committed in furtherance of the conspiracy charged herein in Count Two.

25 All in violation of Title 21, United States Code, Section 846.  
26

1 COUNT THREE: (21 U.S.C. § 846)

2 The Grand Jury further charges that:

3 Beginning at a time unknown to the Grand Jury, but not later than in and during  
4 the year 1996 and continuing thereafter until at least in or about June 3, 1998, in the  
5 County of Alameda, State and Northern District of California, and elsewhere,

6 KEVIN LEE DAVIS,  
7 aka "Slow,"  
8 aka "Yellow Dude";  
9 CHRISTOPHER L. MASTERS,  
10 aka "Crid";  
11 TASHIRI TALIB-DIN,  
12 aka "Killer Reg,"  
13 aka "K.R.,"  
14 aka "Tasha";  
15 JAMES PATTON,  
16 KENNETH NEVILLE,  
17 aka "Kenny Smith,"  
18 aka "Randall V. Terry"; and  
19 LIONEL McCOY,  
20 aka "Jock";

21 defendants herein, willfully and knowingly did combine, conspire, confederate and agree  
22 with each other and with other persons whose names are both known and unknown to the  
23 Grand Jury, including unindicted coconspirators Alfredo Robles-Rosas, Sandy Medina,  
24 John "O.G." Jackson, Anthony Spradley, Darvelle Smith, Lawon Taylor, Lee Foley,  
25 Stephanie Wilson, William Sidney Cox, Rick York, Robert Johnson, Keith Cork, and  
26 Gregory Brizendine, to possess with intent to distribute and to distribute across interstate  
lines from California into other States, including but not limited to Indiana, Kansas,  
Kentucky, Missouri, and Nebraska, 5 kilograms or more of a substance containing  
cocaine, a Schedule I controlled substance, in violation of Title 21, United States Code,  
Section 841(a)(1);

24 MEANS AND METHODS

- 25 1. It was part of the conspiracy that certain of the defendants and their  
26 coconspirators would and did deliver multiple-kilogram shipments of  
cocaine to defendant KEVIN LEE DAVIS and his agents.

2. It was further part of the conspiracy that defendant KEVIN LEE DAVIS would and did employ trusted associates to travel from California to other States in the United States to distribute his cocaine to other cocaine distributors in Indiana, Kentucky, and Missouri.
3. It was further part of the conspiracy that defendant KEVIN LEE DAVIS, other defendants and certain of their coconspirators would and did use a numeric pager code system using telephones, cellular telephones, pagers and public pay telephones to negotiate illicit cocaine transactions, including to communicate the price per kilogram of cocaine, the available or desired quantity, delivery times, locations, and the identity of the customer and delivery courier.
4. It was further part of the conspiracy that certain of the defendants and their coconspirators when not using the numeric pager code communicated in coded conversations over cellular, residential, hotel, and public pay phones.
5. It was further part of the conspiracy that certain of the defendants and their coconspirators would use female names and the feminine form of pronouns to attempt to disguise the identity of male coconspirators.
6. It was further part of the conspiracy that certain of the defendants and their coconspirators were identified by unique assigned numbers in the pager code system, including: defendant KEVIN LEE DAVIS "84"; defendant CHRISTOPHER L. MASTERS "112"; defendant TASHIRI TALIB-DIN "11"; defendant JAMES PATTON "357"; defendant KENNETH NEVILLE "31"; defendant LIONEL McCOY "115" and "11500"; unindicted coconspirators Sandy Medina and Alfredo Robles-Rosas "49" and "84"; unindicted coconspirator Lawon Taylor "04 ."
7. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did deliver, collect, count, package, store, and transport cash proceeds of cocaine sales for the benefit of defendant KEVIN LEE DAVIS.
8. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did use force, fear, threats, intimidation, murder, reports of murders and attempted murders, and "hush" money to maintain discipline and secrecy within the organization and to avoid detection by law enforcement.
9. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did use aliases and nicknames to disguise their identities so as to avoid detection by law enforcement personnel.
10. It was further part of the conspiracy that certain of the defendants and their coconspirators did rent hotel rooms and motor vehicles to store and transport cocaine and illicit cash proceeds.
11. It was further part of the conspiracy that certain of the defendants and their coconspirators would and did conduct their financial transactions in cash to avoid detection by law enforcement personnel.



## OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of it, the conspirators committed the following overt acts, among others, in the State and Northern District of California and elsewhere:

1. On or about February 1, March 22, April 18, May 1, May 2, and May 17, 1996 unindicted codefendant Darvelle Smith traveled to St. Louis, Missouri.
2. On or about May 20, 1996 unindicted coconspirator Darvelle Smith was in possession of approximately four kilograms of cocaine in St. Louis, Missouri.
3. On or about May 21, 1996 unindicted coconspirator Darvelle Smith was in possession of approximately \$50,000 cash, seven cellular telephones, two semi-automatic pistols, a revolver, a rifle and an AK-47 assault rifle at his residence in San Ramon, California.
4. In or about July, 1996 unindicted coconspirator William Sidney Cox traveled from Indianapolis, Indiana in a rented van and delivered the van and a black leather shoulder bag containing cash to an agent of defendant KEVIN LEE DAVIS in Oakland, California.
5. In or about July, 1996 an agent of defendant KEVIN LEE DAVIS returned a rented vehicle and a black leather bag containing cocaine to unindicted coconspirator William Sidney Cox who transported them from Oakland, California and delivered them to an agent of unindicted coconspirator Anthony Spradley in Indianapolis, Indiana.
6. In or about August, 1996 defendant KEVIN LEE DAVIS traveled to Indianapolis, Indiana from California where unindicted coconspirator John "O.G." Jackson introduced him to unindicted coconspirator Lawon Taylor.
7. In and about the Fall of 1996 defendant KEVIN LEE DAVIS traveled to Indianapolis, Indiana from California and met with unindicted coconspirator John "O.G." Jackson.
8. In or about November, 1996 defendant KEVIN LEE DAVIS traveled to and met with unindicted coconspirators Anthony Spradley and Keith Cork in Las Vegas, Nevada.
9. In or about the Fall of 1996 unindicted coconspirator William Sidney Cox traveled from Indianapolis, Indiana to Oakland, California with a bag containing cash and a rented vehicle given to him by unindicted coconspirator Anthony Spradley for delivery to defendant KEVIN LEE DAVIS.

10. In or about the Fall of 1996 unindicted coconspirator William Sidney Cox paged defendant KEVIN LEE DAVIS at (510) 914-7302
11. In or about the Fall of 1996 unindicted coconspirator William Sidney Cox delivered a bag containing cash and a van to an agent of defendant KEVIN LEE DAVIS and two days later received in return another rental vehicle and a similar bag containing cocaine which he transported from Oakland, California to Indianapolis, Indiana and there delivered to unindicted coconspirator Anthony Spradley.
12. Between in and about late 1996 and in and about the Fall of 1997, defendant KEVIN LEE DAVIS dispatched unindicted coconspirator Gregory Brizendine to transport and deliver cocaine from California to Louisville and Lexington, Kentucky.
13. On or about February 22, 1997 unindicted coconspirators Lee Foley and Stephanie Wilson possessed approximately twenty kilograms of cocaine in Nebraska supplied by defendant KEVIN LEE DAVIS and transported by them in a car rented in Walnut Creek, California on or about February 20, 1997 in the name of Ruby Davis.
14. On or about March 6, 1997 unindicted coconspirators William Sidney Cox and Rick York possessed approximately \$305,000 cash in a duffle bag in Kansas that they were transporting to defendant KEVIN LEE DAVIS in Oakland, California in payment for cocaine earlier supplied by defendant KEVIN LEE DAVIS to unindicted coconspirator Anthony Spradley.
15. On or about May 13, 1997 defendant JAMES PATTON traveled to Louisville, Kentucky and stayed at the Club Hotel by Doubletree, Room 1288, to facilitate a cocaine transaction on behalf of defendant KEVIN LEE DAVIS.
16. Between in and about the Fall of 1997 and in and about June 3, 1998 defendant KEVIN LEE DAVIS dispatched defendant TASHIRI TALIB-DIN to transport and deliver cocaine from California to Louisville and Lexington, Kentucky.
17. On or about October 15, 1997 defendant TASHIRI TALIB-DIN took possession of a green 1993 Cadillac Seville as collateral for a drug debt owed to defendant KEVIN LEE DAVIS and drove the car from Kentucky to California where he converted it to his own use.
18. Between in and about the Fall of 1997 and in and about June 3, 1998 defendant KEVIN LEE DAVIS dispatched defendant JAMES PATTON to transport and deliver cocaine from California to Indianapolis, Indiana and Kansas City, Missouri.
19. On or about December 2, 1997 defendant JAMES PATTON traveled from California to Louisville, Kentucky and while there delivered cocaine and collected payment for cocaine on behalf of defendant KEVIN LEE DAVIS.
20. On or about December 12, 1997 defendant KEVIN LEE DAVIS paged unindicted coconspirator Lawon Taylor to negotiate a sale of cocaine at a price of \$22,000 per kilogram.

21. Between on or about December 15, 1997 and December 18, 1997 defendant JAMES PATTON traveled from California to Louisville, Kentucky and while there delivered cocaine and collected payment for cocaine on behalf of defendant KEVIN LEE DAVIS.
22. On or about December 29, 1997 defendants KEVIN LEE DAVIS and KENNETH NEVILLE met at the Four Points Hotel in Emeryville, California.
23. On or about December 29, 1997 defendants KEVIN LEE DAVIS and CHRISTOPHER L. MASTERS spoke on the telephone about defendant KENNETH NEVILLE.
24. On or about December 31, 1997 defendant CHRISTOPHER L. MASTERS told defendant KEVIN LEE DAVIS in a telephone conversation that tomorrow would be "Frosty the Snowman."
25. On or about January 15, 1998 defendants KEVIN LEE DAVIS and KENNETH NEVILLE met at Red Robin restaurant in San Leandro, California.
26. On or about January 15, 1998 defendant KENNETH NEVILLE traveled by airplane to Indianapolis, Indiana from San Francisco, California carrying \$5,500 cash.
27. On or about January 25, 1998 defendant TASHIRI TALIB-DIN traveled to Lexington, Ky and stayed there at the Marriott Hotel Room 624.
28. On or about between February 17, 1998 and February 20, 1998 defendant TASHIRI TALIB-DIN traveled to Louisville, Kentucky on behalf of defendant KEVIN LEE DAVIS to deliver cocaine and/or obtain payment for an earlier cocaine delivery to unindicted coconspirator Lawon Taylor.
29. On or about February 19, 1998 unindicted coconspirator Lawon Taylor . paged defendant TASHIRI TALIB-DIN.
30. On or about February 20, 1998 defendant KEVIN LEE DAVIS spoke on the telephone with defendant CHRISTOPHER L. MASTERS to ask if a coconspirator was all right.
31. On or about February 20, 1998 defendant KEVIN LEE DAVIS telephoned the Doubletree Hotel in Louisville, Kentucky and instructed the man answering to call "Crid" (defendant CHRISTOPHER L. MASTERS) to let him know that the "girl" had not called the hotel yet, and that "she" would be "hitting" (paging) him soon.
32. On or about April 8, 1998 defendant JAMES PATTON traveled from California to Kansas City, Missouri and while there delivered cocaine and collected payment for cocaine on behalf of defendants KEVIN LEE DAVIS and LIONEL McCOY.

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33. On or about between April 6, 1998 and April 11, 1998 defendants JAMES PATTON, LIONEL McCOY, and KEVIN LEE DAVIS used pagers, telephones, and telephone conversations to arrange for a delivery of cocaine supplied by defendant KEVIN LEE DAVIS.
  34. On or about April 9, 1998 defendant CHRISTOPHER L. MASTERS told defendant KEVIN LEE DAVIS in a telephone conversation that defendant KEVIN LEE DAVIS could use defendant CHRISTOPHER L. MASTERS to kill, injure, threaten and intimidate persons who caused problems for defendant KEVIN LEE DAVIS.
  35. On or about April 9, 1998 defendant KEVIN LEE DAVIS instructed defendant CHRISTOPHER L. MASTERS to communicate with defendant JAMES PATTON and explained to defendant CHRISTOPHER L. MASTERS how to find a pay phone that will take incoming calls.
  36. On or about April 10, 1998 defendant LIONEL McCOY sent a message to defendant KEVIN LEE DAVIS' pager to advise defendant KEVIN LEE DAVIS that \$63,000 had been or would be paid for cocaine supplied by defendant KEVIN LEE DAVIS.
  37. On or about April 11, 1998 defendant JAMES PATTON acting on behalf of defendant KEVIN LEE DAVIS transported from Kansas City, Missouri to San Francisco, California approximately \$63,000 cash proceeds of a three kilogram cocaine sale.
  38. On or about April 11, 1998 defendant JAMES PATTON used a "911" code to page defendant KEVIN LEE DAVIS, and defendant KEVIN LEE DAVIS used a "911" code to page defendant LIONEL McCOY.
  39. On or about April 11, 1998 defendants JAMES PATTON, KEVIN LEE DAVIS, and LIONEL McCOY spoke on the telephone to discuss the seizure by police of approximately \$63,000 cash that defendant JAMES PATTON was to deliver to defendant KEVIN LEE DAVIS in payment for three kilograms of cocaine supplied by defendant KEVIN LEE DAVIS.
  40. On or about April 11, 1998 defendants JAMES PATTON, KEVIN LEE DAVIS and LIONEL McCOY met at 10507 Byron in Oakland to discuss the seizure of approximately \$63,000 cash from defendant JAMES PATTON.
  41. On or about April 11, 1998 defendant KEVIN LEE DAVIS told defendant CHRISTOPHER L. MASTERS in a telephone conversation that things were "ugly" and "out of the fucking question" with defendants JAMES PATTON and LIONEL McCOY.
  42. On or about April 20, 1998 defendant CHRISTOPHER L. MASTERS spoke on the telephone with defendant KEVIN LEE DAVIS and reported what actions he had taken to find "Baby" (unindicted coconspirator John "O.G." Jackson) and that he was so far unsuccessful.

- 1 43. On or about April 21, 1998 defendant CHRISTOPHER L. MASTERS  
2 spoke on the telephone with defendant KEVIN LEE DAVIS who said he  
3 had to "talk bad" to "Original" (unindicted coconspirator John "O.G."  
4 Jackson).
- 5 44. On or about May 7, 1998 defendant KEVIN LEE DAVIS instructed  
6 defendant CHRISTOPHER L. MASTERS to find a room for the night for  
7 an unidentified coconspirator and not to charge it.
- 8 45. On or about May 14, 1998 defendant CHRISTOPHER L. MASTERS used  
9 a pay telephone on the 300 block of E. 18<sup>th</sup> Street between approximately  
10 1:30 p.m. and 1:42 p.m.
- 11 46. On or about June 3, 1998 defendant JAMES PATTON possessed a cellular  
12 telephone at his residence at 2000 Claybank Road, Apt. P-8, Fairfield,  
13 California.
- 14 47. On or about June 3, 1998 defendant TASHIRI TALIB-DIN possessed  
15 approximately 175 grams of crack cocaine, two loaded semi-automatic  
16 pistols, a scale used to weigh cocaine, a cellular telephone, court documents  
17 related to a 1994 federal wiretap narcotics investigation, and a Cadillac  
18 delivered to him in Louisville, Kentucky by unindicted coconspirator  
19 Lawon Taylor as security for a drug debt owed by unindicted coconspirator  
20 Lawon Taylor to defendant KEVIN LEE DAVIS.

21 The Grand Jury further charges that the offenses set forth in Counts Seven through  
22 Twenty-Two, Twenty-Four, Twenty-Five, Twenty-Seven, Twenty-Eight, Thirty-four  
23 through Forty, Forty-Two, Fifty-Two through Fifty-Eight, Sixty-One through Sixty-  
24 Seven, Sixty-Nine through Seventy-Three, Seventy-Five through One Hundred Two, and  
25 One Hundred Ten through One Hundred Twenty of this Second Superseding Indictment  
26 were committed in furtherance of the conspiracy charged herein in Count Three.

All in violation of Title 21, United States Code, Section 846.

COUNT FOUR: (21 U.S.C. § 846)

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but not later than in and during March, 1998 and continuing thereafter until at least on or about April 21, 1998, in the State and Northern District of California, and elsewhere,

KEVIN LEE DAVIS,  
aka "Slow,"  
aka "Yellow Dude"

defendant herein, willfully and knowingly did attempt to possess with intent to distribute and to distribute 5 kilograms of more of a substance containing cocaine, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 846.

COUNT FIVE: (18 U.S.C. § 3)

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but not later than on and about March 17, 1998 and continuing thereafter until on or about April 22, 1998, in the State and Northern District of California, and elsewhere,

CHRISTINE JACKSON,

defendant herein, knowing that an offense against the United States had been committed; to wit: a violation of Title 21, United States Code, Section 841 (possession of five kilograms or more of a substance containing cocaine with intent to distribute), and a violation of Title 21, United States Code, Section 846 (attempt to possess five kilograms or more of a substance containing cocaine with intent to distribute) as charged in Count Four of this Second Superseding Indictment, did receive, relieve, comfort and assist the offender, to wit: Kevin Lee Davis, in order to hinder or prevent his apprehension, trial or punishment, in violation of Title 18, United States Code, Section 3.

COUNT SIX: (21 U.S.C. § 846)

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but not later than in and during February 7, 1998 in the State and Northern District of California, and elsewhere,

KEVIN LEE DAVIS,  
aka "Slow,"  
aka "Yellow Dude";  
DARON OWENS,  
aka "Little Brother"; and  
MARCUS BELTON,  
aka "Samuel Glenn,"  
aka "Rambo";

defendant herein, willfully and knowingly did attempt to possess with intent to distribute and to distribute 500 grams or more of a substance containing cocaine, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 846.



COUNTS SEVEN through THIRTY-THREE: (21 U.S.C. § 841(a)(1))  
(18 U.S.C. § 2)

The Grand Jury further charges that:

On or about the dates hereinafter set forth in Counts Seven through Thirty-Three of this Second Superseding Indictment, in the State and Northern District of California and elsewhere, the below-named defendants did knowingly and intentionally possess and aid and abet the possession with intent to distribute, and did distribute and aided and abetted the distribution of the below-described quantities of substances containing cocaine and cocaine base, Schedule I controlled substances:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT(S)</u>	<u>AMOUNT / DRUG</u>
SEVEN	8/19/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
EIGHT	8/27/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
NINE	10/14/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
TEN	10/19/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
ELEVEN	11/28/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
TWELVE	12/2/97	KEVIN LEE DAVIS JAMES PATTON	Approximately 3 kilograms of a substance containing cocaine
THIRTEEN	12/5/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
FOURTEEN	12/12/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
FIFTEEN	12/15/97	KEVIN LEE DAVIS JAMES PATTON	Approximately 3 kilograms of a substance containing cocaine

1	SIXTEEN	12/19/97	KEVIN LEE DAVIS KENNETH NEVILLE	Approximately 3 kilograms of a substance containing cocaine
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3	SEVENTEEN	12/29/97	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
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5	EIGHTEEN	12/30/97	KEVIN LEE DAVIS KENNETH NEVILLE	Approximately 3 kilograms of a substance containing cocaine
6				
7	NINETEEN	1/15/98	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
8				
9	TWENTY	1/22/98	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
10				
11	TWENTY-ONE	1/28/98	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
12				
13	TWENTY-TWO	2/5/98	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
14				
15	TWENTY-THREE	2/7/98	KEVIN LEE DAVIS DARON OWENS	500 grams or more of a substance containing cocaine
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17	TWENTY-FOUR	2/13/98	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
18				
19	TWENTY-FIVE	2/24/98	KEVIN LEE DAVIS TASHIRI TALIB-DIN	Approximately 3 kilograms of a substance containing cocaine
20				
21	TWENTY-SIX	2/26/98	EMMANUEL CHRISTY	500 grams or more of a substance containing cocaine
22				
23	TWENTY-SEVEN	4/8/98	KEVIN LEE DAVIS JAMES PATTON	Approximately 3 kilograms of a substance containing cocaine
24				
25	TWENTY-EIGHT	4/9/98	KEVIN LEE DAVIS JAMES PATTON LIONEL McCOY	500 grams or more of a substance containing cocaine
26				

1	TWENTY-NINE	4/13/98 KEVIN LEE DAVIS DARON OWENS	500 grams or more of a substance containing cocaine
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3	THIRTY	6/3/98 TASHIRI TALIB-DIN	100 grams or more of a substance containing cocaine base
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5	THIRTY-ONE	6/3/98 KEVIN LEE DAVIS DARON OWENS	500 grams or more of a substance containing cocaine
6			
7	THIRTY-TWO	6/3/98 MARCUS BELTON	500 grams or more of a substance containing cocaine
8	THIRTY-THREE	6/3/98 MARVIN WOODARD	100 grams or more of a substance containing cocaine base

9 All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
10 States Code, Section 2.  
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COUNTS THIRTY-FOUR through SEVENTY-FIVE: (21 U.S.C. § 843(b))

The Grand Jury further charges that:

On or about the dates hereinafter set forth in Counts Thirty-Four through Seventy-Five of this Second Superseding Indictment, in the State and Northern District of California and elsewhere, the below-named defendants did knowingly and intentionally use a telephone facility to further drug felonies, to wit: operation of a continuing criminal enterprise, in violation of 21 U.S.C. § 848 as charged herein in Count One; possession with intent to distribute and distribution of substances containing cocaine and cocaine base in violation of 21 U.S.C. § 841(a)(1) as charged herein in Counts Seven through Thirty-Three, attempt to possess with intent to distribute a substance containing cocaine, and conspiracy to possess with intent to distribute and to distribute substances containing cocaine in violation of 21 U.S.C. § 846 as charged herein in Counts Two, Three, Four, and Six:

<u>COUNT</u>	<u>DATE / TIME</u>	<u>DEFENDANTS</u>
THIRTY-FOUR	12/19/97 2:05 p.m.	KEVIN LEE DAVIS
THIRTY-FIVE	12/19/97 3:30 p.m.	KEVIN LEE DAVIS KENNETH NEVILLE
THIRTY-SIX	12/27/97 9:12 p.m.	KEVIN LEE DAVIS KENNETH NEVILLE
THIRTY-SEVEN	12/27/97 9:14 p.m.	KEVIN LEE DAVIS
THIRTY-EIGHT	12/31/97 2:16 p.m.	KEVIN LEE DAVIS CHRISTOPHER L. MASTERS
THIRTY-NINE	2/6/98 10:24 p.m.	TASHIRI TALIB-DIN
FORTY	2/7/98 12:10 a.m.	TASHIRI TALIB-DIN
FORTY-ONE	2/7/98 12:32 p.m.	KEVIN LEE DAVIS MARCUS BELTON
FORTY-TWO	2/7/98 3:32 p.m.	TASHIRI TALIB-DIN

1	FORTY-THREE	2/7/98 4:00 p.m.	KEVIN LEE DAVIS MARCUS BELTON
2	FORTY-FOUR	2/7/98 4:21 p.m.	KEVIN LEE DAVIS MARCUS BELTON
3	FORTY-FIVE	2/7/98 4:28 p.m.	KEVIN LEE DAVIS MARCUS BELTON
4	FORTY-SIX	2/7/98 4:35 p.m.	KEVIN LEE DAVIS DARON OWENS
5	FORTY-SEVEN	2/7/98 4:35 p.m.	KEVIN LEE DAVIS MARCUS BELTON
6	FORTY-EIGHT	2/7/98 4:36 p.m.	KEVIN LEE DAVIS DARON OWENS
7	FORTY-NINE	2/7/98 4:38 p.m.	KEVIN LEE DAVIS MARCUS BELTON
8	FIFTY	2/7/98 4:45 p.m.	KEVIN LEE DAVIS MARCUS BELTON
9	FIFTY-ONE	2/7/98 6:09 p.m.	KEVIN LEE DAVIS MARCUS BELTON
10	FIFTY-TWO	2/7/98 7:43 p.m..	TASHIRI TALIB-DIN
11	FIFTY-THREE	2/8/98 6:20 a.m.	TASHIRI TALIB-DIN.
12	FIFTY-FOUR	2/8/98 12:50 p.m.	TASHIRI TALIB-DIN
13	FIFTY-FIVE	2/8/98 1:29 p.m.	TASHIRI TALIB-DIN
14	FIFTY-SIX	2/20/98 3:25 p.m.	KEVIN LEE DAVIS CHRISTOPHER L. MASTERS
15	FIFTY-SEVEN	2/25/98 1:47 p.m.	TASHIRI TALIB-DIN
16	FIFTY-EIGHT	2/25/98 7:57 p.m.	TASHIRI TALIB-DIN
17	FIFTY-NINE	3/17/98 11:07 p.m.	TASHIRI TALIB-DIN DARON OWENS
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	SIXTY	3/17/98 6:50 p.m.	KEVIN LEE DAVIS CHRISTINE JACKSON
2	SIXTY-ONE	4/9/98 4:43 p.m.	CHRISTOPHER L. MASTERS KEVIN LEE DAVIS
3	SIXTY-TWO	4/9/98 10:36 a.m.	KEVIN LEE DAVIS CHRISTOPHER L. MASTERS
4	SIXTY-THREE	4/9/98 4:48 p.m.	KEVIN LEE DAVIS CHRISTOPHER L. MASTERS
5	SIXTY-FOUR	4/10/98 9:39 p.m.	LIONEL McCOY KEVIN LEE DAVIS
6	SIXTY-FIVE	4/11/98 2:27 p.m.	JAMES PATTON KEVIN LEE DAVIS
7	SIXTY-SIX	4/11/98 4:21 p.m.	KEVIN LEE DAVIS LIONEL McCOY.
8	SIXTY-SEVEN	4/11/98 6:29 p.m.	KEVIN LEE DAVIS CHRISTOPHER L. MASTERS
9	SIXTY-EIGHT	4/13/98 5:08 p.m.	DARON OWENS
10	SIXTY-NINE	4/20/98 7:59 p.m.	CHRISTOPHER L. MASTERS KEVIN LEE DAVIS
11	SEVENTY	4/22/98 9:11 a.m.	CHRISTINE JACKSON KEVIN LEE DAVIS
12	SEVENTY-ONE	4/22/98 10:23 a.m.	KEVIN LEE DAVIS JAMES PATTON
13	SEVENTY-TWO	5/7/98 6:26 p.m.	CHRISTOPHER L. MASTERS KEVIN LEE DAVIS
14	SEVENTY-THREE	5/15/98 8:00 p.m.	KEVIN LEE DAVIS CHRISTOPHER L. MASTERS
15	SEVENTY-FOUR	5/24/98 3:53 p.m.	KEVIN LEE DAVIS MARCUS BELTON
16	SEVENTY-FIVE	5/24/98 3:58 p.m.	KEVIN LEE DAVIS

All in violation of Title 21, United States Code, Section 843(b).

1 COUNTS SEVENTY-SIX through NINETY-SEVEN: (18 U.S.C. §1952(a)(3) and §2)

2 The Grand Jury further charges that:

3 On or about the dates and in the manner hereinafter set forth in Counts Seventy-Six  
4 through Ninety-Seven of this Second Superseding Indictment, in the State and Northern  
5 District of California and elsewhere, the below-listed defendants did aid, abet, counsel,  
6 command induce, procure and cause travel in interstate commerce to and from the State and  
7 Northern District of California from and to a place outside the State of California with the  
8 intent to promote, manage, establish, carry on, and facilitate the promotion, management,  
9 establishment and carrying on of an unlawful activity, to wit: a business enterprise  
10 involving the transportation and distribution of a controlled substance, to wit: a substance  
11 containing cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 846,  
12 and 848, and did thereafter perform and attempt to perform, and did aid, abet, counsel,  
13 command, induce, procure and cause another to perform and attempt to perform an act to  
14 promote, manage, establish, carry on and facilitate the promotion, management,  
15 establishment, and carrying on of that unlawful activity, as set forth in Counts One,  
16 Three, Seven through Twenty-Two, Twenty-Four, Twenty-Five, Twenty-Seven, and  
17 Twenty-Eight of this Second Superseding Indictment, the allegations of which are fully  
18 incorporated herein;

19 COUNT DATE DEFENDANT

20 SEVENTY- 8/19/97 TASHIRI TALIB-DIN  
21 SIX KEVIN LEE DAVIS

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24 SEVENTY- 8/27/97 TASHIRI TALIB-DIN  
25 SEVEN KEVIN LEE DAVIS  
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TO WIT:

Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter registered as a guest and stayed in Room 1125 at Club Hotel by Doubletree in Louisville, Kentucky and delivered cocaine and collected payment for cocaine.

Traveled by airplane from San Francisco California to Louisville, Kentucky and thereafter registered as a guest and stayed at Louisville Marriott East hotel and delivered cocaine and collected payment for cocaine.

2	SEVENTY- EIGHT	10/14/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter delivered cocaine and collected payment for cocaine.
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4	SEVENTY- NINE	10/15/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by car from Kentucky to California and thereafter caused title to a car registered in Kentucky to be transferred to him in California.
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7	EIGHTY-	10/19/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Lexington, Kentucky and registered as a guest and stayed at Marriott's Griffin Gate and delivered cocaine and collected payment for cocaine.
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10	EIGHTY- ONE	11/28/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter registered as a guest and stayed at Louisville Marriott East hotel and delivered cocaine and collected payment for cocaine.
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13	EIGHTY- TWO	12/2/97	JAMES PATTON KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter delivered cocaine and collected payment for cocaine
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16	EIGHTY- THREE	12/5/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter registered as a guest and stayed at the Fairfield Inn Room 114 in Louisville, Kentucky and delivered cocaine and collected payment for cocaine.
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20	EIGHTY- FOUR	12/12/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Lexington, Kentucky and thereafter registered as a guest and stayed at Room 536 in Marriott's Griffin Gate hotel and delivered cocaine and collected payment for cocaine.
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24	EIGHTY- FIVE	12/15/97	JAMES PATTON KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter delivered cocaine and collected payment for cocaine
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1	EIGHTY-SIX	12/19/97	KENNETH NEVILLE KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter registered as a guest and stayed in Room 521 of the Louisville Holiday Inn and delivered cocaine and collected payment for cocaine.
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4	EIGHTY-SEVEN	12/29/97	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Jose, California to Louisville, Kentucky and thereafter registered as a guest and stayed in Room 424 at the Marriott Louisville East and delivered cocaine and collected payment for cocaine.
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8	EIGHTY-EIGHT	12/30/97	KENNETH NEVILLE KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter delivered cocaine and collected payment for cocaine.
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10	EIGHTY-NINE	1/15/98	KENNETH NEVILLE KEVIN LEE DAVIS	Traveled by airplane from Louisville, Kentucky to San Jose, California and thereafter registered as a guest and stayed in Room 612 at the San Jose Doubletree Hotel from where he accepted telephone calls from and arranged to meet with Kevin Lee Davis.
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14	NINETY	1/15/98	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Jose, California to Louisville, Kentucky and thereafter registered as a guest and stayed at the Courtyard Louisville East and delivered cocaine and collected payment for cocaine.
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18	NINETY-ONE	1/22/98	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Lexington, Kentucky and thereafter registered as a guest and stayed in Room 624 at Marriott's Griffin Gate and delivered cocaine and collected payment for cocaine.
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21	NINETY-TWO	1/28/98	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Francisco, California to Louisville, Kentucky and thereafter registered as a guest and stayed at the Courtyard Louisville East and delivered cocaine and collected payment for cocaine.
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26	NINETY-THREE	2/5/98	TASHIRI TALIB-DIN KEVIN LEE DAVIS	Traveled by airplane from San Jose, California to Louisville, Kentucky and thereafter registered as a guest and stayed at the Residence Inn and delivered cocaine and collected payment for cocaine.

1 NINETY- 2/13/98 KENNETH NEVILLE Traveled by airplane from San Jose,  
2 FOUR KEVIN LEE DAVIS California to Louisville, Kentucky and  
3 thereafter delivered cocaine and  
4 collected payment for cocaine.  
5 NINETY- 2/20/98 KEVIN LEE DAVIS Traveled by airplane from  
6 FIVE JOHN DOE I California to Louisville, Kentucky and  
7 thereafter delivered cocaine and  
8 collected payment for cocaine.  
9 NINETY- 2/24/98 TASHIRI TALIB-DIN Traveled by airplane from San Jose,  
10 SIX KEVIN LEE DAVIS California to Louisville, Kentucky and  
11 thereafter delivered cocaine and  
12 collected payment for cocaine.  
13 NINETY- 4/8/98 JAMES PATTON Traveled by airplane from San Francisco,  
14 SEVEN KEVIN LEE DAVIS California to Kansas City, Missouri and  
15 LIONEL McCOY thereafter registered as a guest in Room  
16 718 at the Ramada Hotel and delivered  
17 cocaine and collected payment for  
18 cocaine

19 All in violation of Title 18, United States Code, §§ 1952(a)(3) and 2.  
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COUNT NINETY-EIGHT: (18 U.S.C. §1952(a)(2) and §2)

The Grand Jury further charges that:

On or about January 16, 1998, , in the State and Northern District of California  
and elsewhere,

KEVIN LEE DAVIS, and  
CHRISTOPHER L. MASTERS,

defendants herein, did aid, abet, counsel, command induce, procure and cause travel in  
interstate commerce to and from the State and Northern District of California from and to  
a place outside the State of California, to wit: Birmingham, Alabama and Atlanta,  
Georgia, with the intent to commit a crime of violence to further an unlawful activity, to  
wit: a business enterprise involving the transportation and distribution of a controlled  
substance, to wit: a substance containing cocaine, in violation of Title 21, United States  
Code, Sections 841(a)(1), 846, and 848, and did thereafter perform and attempt to  
perform, and did aid, abet, counsel, command, induce, procure and cause another to  
perform and attempt to perform a crime of violence to further that unlawful activity, to  
wit: attempt to locate and murder a human being, Anthony Spradley;

All in violation of Title 18, United States Code, §§ 1952(a)(2) and 2.

COUNT NINETY-NINE: (18 U.S.C. §1952(a)(2) and §2)

The Grand Jury further charges that:

On or about January 26, 1998, , in the State and Northern District of California  
and elsewhere,

KEVIN LEE DAVIS, and  
CHRISTOPHER L. MASTERS,

defendants herein, did aid, abet, counsel, command induce, procure and cause travel in  
interstate commerce to and from the State and Northern District of California from and to  
a place outside the State of California, to wit: Atlanta, Georgia, with the intent to commit  
a crime of violence to further an unlawful activity, to wit: a business enterprise involving  
the transportation and distribution of a controlled substance, to wit: a substance  
containing cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 846,  
and 848, and did thereafter perform and attempt to perform, and did aid, abet, counsel,  
command, induce, procure and cause another to perform and attempt to perform a crime  
of violence to further that unlawful activity, to wit: attempt to locate and murder a human  
being, Anthony Spradley;

All in violation of Title 18, United States Code, §§ 1952(a)(2) and 2.

1 COUNT ONE HUNDRED: (18 U.S.C. §1952(a)(1) and §2)

2 The Grand Jury further charges that:

3 On or about April 11, 1998 in the State and Northern District of California and  
4 elsewhere,

5 KEVIN LEE DAVIS,  
6 LIONEL McCOY, and  
7 JAMES PATTON,

8 defendants herein, did travel and aid and abet travel in state commerce, to wit: travel by  
9 airplane from Kansas City, Missouri to San Francisco, California; and used and aided  
10 and abetted the use of a facility in interstate commerce, to wit airline travel, with the  
11 intent to distribute the proceeds of an unlawful activity, to wit: drug trafficking;

12 All in violation of Title 18 United States Code §1952(a)(1) and §2.  
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COUNTS ONE HUNDRED ONE THROUGH ONE HUNDRED FOUR:  
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges that:

On or about the dates hereinafter set forth in Counts One Hundred through One Hundred Three of this Second Superseding Indictment, in the State and Northern District of California and elsewhere, the below-named defendants being persons previously convicted of a crime punishable by imprisonment for a term exceeding one year, did possess a firearm and ammunition in and affecting interstate and foreign commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>FIREARM</u>
ONE HUNDRED ONE	12/24/95	KEVIN LEE DAVIS	Handgun and ammunition
ONE HUNDRED TWO	6/3/98	KEVIN LEE DAVIS	Twelve .380 PMC caliber rounds of ammunition
ONE HUNDRED THREE	6/3/98	MARVIN WOODARD	Lorcin 9 mm pistol with an obliterated serial number
ONE HUNDRED FOUR	6/3/98	CHARLES EDWARDS	Ammunition for a 223 high-powered rifle, a .38 caliber revolver, and a 9 mm semi-automatic pistol

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ONE HUNDRED FIVE and ONE HUNDRED SIX: (18 U.S.C. § 922(k))

The Grand Jury further charges that:

On or about the dates hereinafter set forth in Counts One Hundred Five and One Hundred Six of this Second Superseding Indictment, in the State and Northern District of California and elsewhere, the below-named defendants did possess and receive a firearm which had the importer's and manufacturer's serial number removed, obliterated, and altered, and which had been shipped and transported in interstate and foreign commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>FIREARM</u>
ONE HUNDRED FIVE	6/3/98	DARON OWENS	Intratec .model CAT .45 caliber semi-automatic handgun
ONE HUNDRED SIX	6/3/98	MARVIN WOODARD	9 mm Lorcin semi- automatic handgun with clip

All in violation of Title 18, United States Code, Section 922(k).

COUNT ONE HUNDRED SEVEN: (18 U.S.C. § 924(c))

The Grand Jury further charges that:

On or about June 3, 1998 in the State and Northern District of California and elsewhere, MARVIN WOODARD, during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, to wit: possession of cocaine and cocaine base with intent to distribute as charged in Count Thirty-Three of this Second Superseding Indictment, did knowingly use and carry a firearm, and in furtherance of such crime did possess a firearm, to wit: a Lorcin 9 mm semi-automatic handgun with an obliterated serial number.

All in violation of Title 18, United States Code, Section 924(c)(1).



COUNT ONE HUNDRED EIGHT: (18 U.S.C. § 924(c))

The Grand Jury further charges that:

On or about June 3, 1998 in the State and Northern District of California and elsewhere,

TASHIRI TALIB-DIN,  
aka "Killer Reg,"  
aka "K.R.,"  
aka "Tasha,"

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, to wit: possession of cocaine and cocaine base with intent to distribute as charged in Count Thirty of this Second Superseding Indictment, did knowingly use and carry a firearm, and in furtherance of such crime did possess a firearm, to wit: an H & K 9 mm semi-automatic handgun (SN 11364) and a Davis Industries P380 caliber semi-automatic pistol (SN AP429131);

All in violation of Title 18, United States Code, Section 924(c)(1).

COUNT ONE HUNDRED NINE: (18 U.S.C. § 924(c))

The Grand Jury further charges that:

On or about June 3, 1998 in the State and Northern District of California and elsewhere,

DARON OWENS,

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, to wit: possession of cocaine and cocaine base with intent to distribute as charged in Count Thirty-One of this Second Superseding Indictment, did knowingly use and carry a firearm, and in furtherance of such crime did possess a firearm, to wit: Intratec .45 caliber semi-automatic pistol with an obliterated serial number;

All in violation of Title 18, United States Code, Section 924(c)(1).

COUNTS ONE HUNDRED TEN through ONE HUNDRED NINETEEN:  
(18 U.S.C. § 1956(a)(1)(A)(i))  
(18 U.S.C. § 2)

The Grand Jury further charges that:

On or about each of the dates set forth below in Counts One Hundred Ten through One Hundred Nineteen of this Second Superseding Indictment, in the State and Northern District of California and elsewhere,

KEVIN LEE DAVIS,  
aka "Slow,"  
aka "Yellow Dude,"

defendant herein, did conduct and did aid and abet the conduct of a financial transaction, to wit: payment of automobile rental charges, which financial transaction involved the proceeds of specified unlawful activity, to wit: drug trafficking, knowing that the transaction represented the proceeds of some form of unlawful activity, and with the intent to promote the carrying on of specified unlawful activity, to wit: drug trafficking:

<u>COUNT</u>	<u>DATE</u>	<u>TO WIT:</u>
ONE HUNDRED TEN	7/22/96	\$2,037.64 cash payment to Dollar Rental Car for rental of a 1996 Plymouth Voyager California license No. 3REU865.
ONE HUNDRED ELEVEN	8/12/96	\$1,297.90 cash payment to Dollar for rental of a 1996 Chrysler LHS California license No. 3REU733
ONE HUNDRED TWELVE	8/26/96	\$937.39 cash payment to Budget Rent A Car for rental of a 1996 Ford Explorer California license No. 3RZF730
ONE HUNDRED THIRTEEN	11/7/96	\$1,176.53 payment by check to American Express for rental of a 1996 Ford Windstar California license No. 3MLS337
ONE HUNDRED FOURTEEN	10/14/96	\$2,447.05 cash payment to Alamo Rent-a-Car for rental of a 1996 Ford SV California license No. 3RFD224
ONE HUNDRED FIFTEEN	11/12/96	\$1,794.61 cash payment to Budget Rent A Car for rental of a 1997 Ford Expedition California license No. 3RZG302
ONE HUNDRED SIXTEEN	1/2/97	\$1,199.10 payment by check to American Express for rental of a 1996 Plymouth Voyager California license No. 3MXT311

1 ONE HUNDRED 4/8/97  
2 SEVENTEEN

\$1,623.58 payment by check to American Express for rental of a 1997 Chevrolet utility truck California license No. 3SJZ166

3 ONE HUNDRED 5/6/97  
4 EIGHTEEN

\$2,080.60 payment by check to American Express for rental of a 1996 Isuzu Rodeo California license No. 3RCF295

5 ONE HUNDRED 4/8/97  
6 NINETEEN

\$2,321.78 payment by check to American Express for rental of a 1997 Dodge Intrepid California license No. 3TXH296;

7 All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i)  
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COUNT ONE HUNDRED TWENTY: (18 U.S.C. §1956(a)(1)(A)(i))

The Grand Jury further charges that:

On or about October 18, 1997 in the Northern District of California and elsewhere,

TASHIRI TALIB-DIN,

defendant herein, did conduct a financial transaction, to wit: the transfer of title to a 1993 Cadillac (VIN 1G6KY5298PU832959) from Donna M. Taylor, a resident of the Commonwealth of Kentucky, to Tashiri Aquil Talib-Din, a resident of the State of California, which financial transaction involved the proceeds of specified unlawful activity, with the knowledge that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, to wit: drug trafficking, and with the intent to promote the carrying on of the specified unlawful activity, to wit: drug trafficking,

All in violation of Title 18, United States Code, § 1956(a)(1)(A) (i).

COUNT ONE HUNDRED TWENTY-ONE: (18 U.S.C. § 1957)

The Grand Jury further charges that:

On or about February 26, 1998 in the State and Northern District of California and elsewhere,

DARON OWENS,

defendant herein, did knowingly engage in a monetary transaction, to wit: the purchase of a 1995 BMW automobile (VIN WBACB4329SFM05105), in criminal derived property that was of a value greater than \$10,000, to wit: approximately \$17, 750, and that was derived from specified unlawful activity, to wit: drug trafficking.

All in violation of Title 18, United States Code, Section 1957.

COUNT ONE HUNDRED TWENTY-TWO: (18 U.S.C. § 1957)

The Grand Jury further charges that:

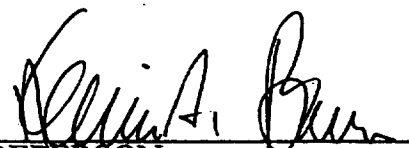
On or about May 12, 1998 in the State and Northern District of California and elsewhere,

DARON OWENS,  
defendant herein, did knowingly engage in a monetary transaction, to wit: the purchase of a 1994 Pontiac Bonneville automobile (VIN 1GZHZ5218R4242038), in criminal derived property that was of a value greater than \$10,000, to wit: approximately \$10,800, and that was derived from specified unlawful activity, to wit: drug trafficking.

All in violation of Title 18, United States Code, Section 1957.

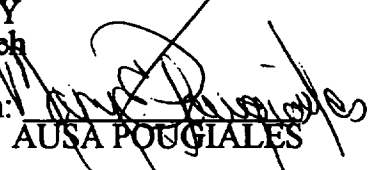
DATED: 10-7-99

A TRUE BILL.

  
FOREPERSON

ROBERT S. MUELLER, III  
United States Attorney

  
JOHN W. KENNEDY  
Chief, Oakland Branch

(Approved as to form: )

AUSA POUZIALES